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Honorable Valerie Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

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January 3, 2024

RE: United States v. Joel Cosme Figueroa
S1 22 CR 00582-001 (VEC)
Request for Adjournment of Sentencing (First)
Request for CJA Funds

Your Honor:

Please receive this letter without objection from the Government.

Sentencing was set for February 1, 2024 to accommodate my trial schedule and journey to Antarctica. I have been trying to get funds from Mr. Cosme Figueroa's significant other to facilitate a request by the Government for a professional psycho-social evaluation. Mr. Cosme Figueroa has a long and documented history (I am leaving certain HIPPA aspects out at this juncture). There is a history of suicidality and hospitalization.

I have read the Court's individual rules and note at 2C Communications with Chambers/ Requests Funding by CJA Counsel are to be made through the CJA voucher system. I, however, am not on the CJA Panel and thus I seek an order for funds for the formal evaluation. I have identified a firm that often works with the CJA Panel.

I look forward to your direction. I request CJA funds for the stated purpose and an adjournment of the sentencing to facilitate a robust evaluation to best educate both the Court and the Government as to Mr. Cosme Figueroa the individual.

Most respectfully,

Stacey Richman

cc:

AUSA Jane Chong, via email: Jane.chong@usdoj.gov

AUSA Matthew Shahabian, via email: matthew.shahabian@usdoj.gov

Application DENIED without prejudice. As further detailed in the Southern District's Plan for Furnishing Representation Pursuant to the Criminal Justice Act, retained counsel representing a party who is "financially unable to obtain investigative, expert or other services necessary for an adequate defense" may request such services in an *ex parte* application. Statements made in support of the application must be made under oath or by sworn affidavit. Any future adjournment request should specify possible dates when the parties are available for sentencing.

SO ORDERED.

 01/03/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE